

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

Civ. Case No. 12-2039 (GAG)

Vs.

COMMONWEALTH OF PUERTO RICO  
and the PUERTO RICO POLICE BUREAU,

Defendants

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**MOTION REQUESTING LEAVE OF COURT TO TENER  
REPLY TO SPECIAL MASTER INFORMATIVE MOTION**

**TO THE HONORABLE COURT:**

**COME NOW**, Defendants, through their undersigned attorneys, and very respectfully  
allege and pray as follows:

1. On December 7, 2020, the Court granted the parties until noon today to submit  
responses to the Special Master Informative Motion Regarding Compliance by the Puerto Rico  
Police Department with the Court-approved COVID-19 Protocol. *See*, Docket No. 1621 and  
1622.

2. Immediately after the December 7 Court Order was issued, the Puerto Rico Police  
Bureau (PRPB) proceeded to review its files, assemble relevant information, and consult with the  
PRPB Commissioner and other professionals in order to chart the way forward in submitting a  
meaningful reply to the Special Master's Informative Motion. This process continued through  
this afternoon given the immense volume of information to be consulted, reviewed, and quickly  
analyzed.

3. Enclosed herewith for the consideration of the Court is Defendants' Reply to Special Master Informative Motion. In an abundance of caution, all exhibits to be submitted in support of the Defendants' Reply are in the Spanish Language. If the Court is amenable to and Grants Defendants's request for leave, then a second motion requesting leave from the Court would have to be filed to submit the referenced exhibits in the Spanish language.

**WHEREFORE**, the Defendants very respectfully request the Court to take notice of the above information and Grant the Defendants the opportunity to tender their reply to the Special Master's Informative Motion.

In San Juan, Puerto Rico, this 9th day of December, 2020.

*s/Raúl E. Bandas*  
Raúl E. Bandas  
USDC-PR No. 207809

*s/Angel A. Valencia-Aponte*  
Angel A. Valencia-Aponte  
USDC-PR No. 123905

*s/Carlos M. Rivera-Vicente*  
Carlos M. Rivera-Vicente  
USDC-PR No. 126304

*s/Marta L. Rivera Ruiz*  
Marta L. Rivera Ruiz  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing Motion Requesting Reconsideration of Order with the Clerk of the Court, using the CM/ECF System, which will send notification of such filing to all appearing parties and counsels using the Court's electronic system.

In San Juan, Puerto Rico, this 9th day of December 2020.

*s/Raúl E. Bandas*  
Raúl E. Bandas-del Pilar  
USDC-PR No. 207809  
Counsel for Defendants